

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**COMPLAINT OF BENJAMIN P. URBELIS
FOR EXONERATION FROM AND/OR
LIMITATION OF LIABILITY,
CIVIL AND MARITIME**

**CIVIL ACTION
NO. 15-12358-ADB**

AFFIDAVIT OF COUNSEL

I, Terence G. Kenneally, attorney for the Plaintiff, Benjamin P. Urbelis, do hereby state and confirm that pursuant to the Order of this Honorable Court, the Notice of Complaint for Exoneration From or Limitation of Liability was published in the newspapers, The Boston Globe and The Boston Herald, as directed by the Order once a week for four [4] successive weeks, and that the same Notice was mailed, no later than the day of the second publication, to every person known to have made any claim against the **M/V NAUT GUILTY**, arising out of the voyage of the **M/V NAUT GUILTY** on or about May 30, 2015, as more fully described in the Complaint.

As of September 25, 2015, the date affixed by the Order in which Claims must be filed, the Plaintiff has received three [3] Claims.

**SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS
28th DAY OF SEPTEMBER, 2015.**

"/s/Terence G. Kenneally"
Terence G. Kenneally
BBO No. 642124